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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

**CENTURY 21 DEPARTMENT STORES LLC,
et al.,**

Debtors.¹

Chapter 11

Case No. 20-12097 (SCC)

(Jointly Administered)

¹ The Debtors in these chapter 11 cases (the “**Chapter 11 Cases**”), along with the last four digits of each Debtor’s federal tax identification number, as applicable, are Century 21 Department Stores LLC (4073), L.I. 2000, Inc. (9619), C21 Department Stores Holdings LLC (8952), Giftco 21 LLC (0347), Century 21 Fulton LLC (4536), C21 Philadelphia LLC (2106), Century 21 Department Stores of New Jersey, L.L.C. (1705), Century 21 Gardens of Jersey, LLC (9882), C21 Sawgrass Blue, LLC (8286), C21 GA Blue LLC (5776), and Century Paramus Realty LLC (5033). The Debtors’ principal place of business is: 22 Cortlandt Street, 5th Floor, New York, NY 10007.

CENTURY 21 DEPARTMENT STORES, LLC,
66 PEARL RETAIL, LLC, 66 PEARL RETAIL II,
LLC, 66 PEARL RETAIL ISG, LLC, 173 BWAY
BLUE LLC, 262 MOTT BLUE TIC LLC,
444 86 BLUE LLC, MIAMI DD 101 BLUE LLC,
28 NEWBURY JSRE TIC LLC, TRUE BLUE
ASSOCIATES LLC, STAR OF DAVID,
IRAYMOND-77 WARREN LLC, SABRA
ASSOCIATES LLC, 315 SEVENTH RETAIL LLC,
WEBWAY ASSOCIATES LLC, and CENTURY
21, INC.,

Plaintiffs,

v.

STARR SURPLUS LINES INSURANCE CO.,
ALLIANZ GLOBAL RISKS US INSURANCE
CO., AXIS SURPLUS LINES INSURANCE CO.,
LIBERTY MUTUAL FIRE INSURANCE CO.,
STEADFAST INSURANCE CO., ENDURANCE
AMERICAN SPECIALTY INSURANCE CO.,
EVANSTON INSURANCE CO., LANDMARK
AMERICAN INSURANCE CO., QBE
SPECIALTY INSURANCE CO., GREAT
AMERICAN FIDELITY INSURANCE CO., and
CERTAIN UNDERWRITERS AT LLOYDS
SUBSCRIBING TO POLICY Nos. PG1902704,
PG1902346, PG1902696, PG1902698, PG1902707,
PG1902702, and PG1902712,

Defendants.

Adv. Proc. No. 20-1222 (SCC)

**STATEMENT OF DEFENDANT GREAT AMERICAN FIDELITY INSURANCE
COMPANY PURSUANT TO FED. R. BANKR. P. 9027(e)(3)**

Defendant Great American Fidelity Insurance Company ("Great American"), by and
through undersigned counsel, hereby files this statement pursuant to Fed. R. Bankr. P.
9027(e)(3).

1. Plaintiffs originally brought the above-referenced insurance coverage action in the Supreme Court of the State of New York, County of New York (Index No. 652975/2020) on July 8, 2020. (the “Insurance Action”).

2. Plaintiffs served the Complaint on Great American on or about August 27, 2020.

3. On September 11, 2020, Plaintiffs removed their own action to the United States District Court for the Southern District of New York.

4. On September 22, 2020, pursuant to the District Court’s Amended Standing Order of Reference (M10-468), this proceeding was referred to this Court (the “Bankruptcy Court”) [Docket No. 1].

5. Great American denies that the Insurance Action constitutes as a core proceeding under 18 U.S.C. § 157(b)(2)(A), (C) or (O) or otherwise.

6. Accordingly, pursuant to 28 U.S.C. § 157(c)(2) and Rule 9027(e)(3) of the Federal Rules of Bankruptcy Procedure, Great American hereby states that it does not consent to the entry of final orders or judgments by the Bankruptcy Court.

7. Great American does not waive and expressly reserves all of its respective rights, claims, defenses and remedies, including without limitation: (a) the right to request that the Court abstain from hearing this proceeding or remand this proceeding; (b) the right to demand a jury trial; and (c) the right to request that the reference of this proceeding to this Court be withdrawn.

Dated: New York, New York
September 30, 2020

MOUND COTTON WOLLAN & GREENGRASS LLP

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CERTIFICATE OF SERVICE

I hereby certify that, on this 30th day of September 2020, a true and correct copy of the foregoing *Statement Pursuant to Fed. R. Bankr. P. 9027(e)(3)* was served upon all counsel of record using the Court's CM/ECF system.

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